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PALISADES CHARTER HIGH SCHOOL and
AMY NGUYEN

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT

ROYA SAGHAFL, an individual,

Plaintiff,

vs.

PALISADES CHARTER HIGH SCHOOL, a
corporation; AMY NGUYEN, an individual; and
DOES 1 through 10,

Defendants.

CASE NO.: **BC708497**

*[Assigned for all purposes to the Honorable Ruth
Ann Kwan, Department 72]*

**DECLARATION OF JAMES R. HIGH, M.D.
IN SUPPORT OF DEFENDANTS
PALISADES CHARTER HIGH SCHOOL
AND AMY NGUYEN'S MEMORANDUM OF
POINTS AND AUTHORITIES IN SUPPORT
OF MOTION TO COMPEL INDEPENDENT
MENTAL EXAMINATION OF PLAINTIFF;
AND REQUEST FOR MONETARY
SANCTIONS**

*[Filed Concurrently with the Memorandum of
Points and Authorities; Declarations of Ellen E.
Cohen and [Proposed] Order]*

RESERVATION ID: 884806840494

Date: July 2, 2019
Time: 9:00 a.m.
Place: Department 72

Complaint Filed: June 1, 2018
FSC: July 19, 2019
Trial: July 29, 2019

DECLARATION OF JAMES R. HIGH, M.D.

I, James R. High, M.D., do declare:

1. I am a medical doctor licensed to practice in the state of California. I make this declaration on personal knowledge. If called as a witness herein, I could and would testify competently to the matters set forth below. I file this declaration in support of Defendants' Motion to Compel Independent Medical Examination of Plaintiff.

2. I understand that the court requires my declaration as to the nature, scope and conditions of the mental examination of the proposed psychiatric examination of the Plaintiff Roya Saghafi ("Plaintiff"), which I believe would be necessary and sufficient for a thorough evaluation of her emotional distress claims.

3. Based on my knowledge and training and also based on my experience in performing over 500 independent medical examinations, it is my professional opinion and also my customary standard and practice to perform a face-to-face psychiatric examination of Plaintiff when possible.

4. My psychiatric examination portion generally takes an estimated three to four hours. It involves history taking and observation of Plaintiff for the purpose of gathering information in specific areas. These include her demographic details, current complaints for which she might seek care, the history of her illness including her subjective experience of the events leading to psychiatric damages. Further history is obtained concerning the development of psychiatric and physical symptoms, what treatments she has received, and the effect of those treatments on her symptoms.

5. In addition to the history of the incident and psychiatric damages at issue, I also gather important information about past psychiatric and medical illnesses and difficulties, and past behavioral difficulties. I also gather important developmental information concerning her family of origin, psychiatric and medical difficulties within that family, her educational background, her work history, and her social development history including information about marriages and children.

6. Concomitant with this examination, I am making observations and inquiries necessary for a full mental status evaluation of the patient, her mood, her thought processes, and thought content.

7. Following my examination, the information gathering is continued by standard, validated series of psychological tests. This not only provides further information about the Plaintiff's

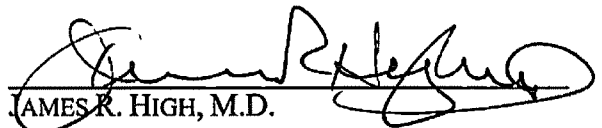
1 psychological damages, but also serves as a check on my subjective impressions. This test battery
2 generally consists in three or more instruments proven to give reliable and valid information about a
3 person's mental state and difficulties. I intend to conduct the Minnesota Multiphasic Personality
4 Inventory-2-RF (MMPI-2-RF), Personality Assessment Inventory (PAI) and Trauma Symptom
5 Inventory (TSI-2) on exams Plaintiff. I will determine whether any other tests such as cognitive
6 screening instruments need to be administered on the day of, and based on the finds of, the psychiatric
7 examination, and notify the parties.

8 8. The estimated time for completion of this part of the examination is also approximately
9 three to four hours. It should be understood that these can only be estimates because the speed with
10 which Plaintiff is able to convey the information she need to fully explain her injurious experience and
11 the speed with which she takes the tests are primarily under her control. For instance, the range of time
12 that plaintiffs have needed to complete the MMPI in my experience has varied from 40 minutes to 6
13 hours.

14 10. No invasive or painful procedures will be utilized.

15 11. I am available to conduct these examinations on June 17, 2019 and have reserved this
16 date for the Plaintiff's examination.

17 I declare under penalty of perjury the foregoing is true and correct. Executed this 9th day of
18 May, 2019 at Los Angeles, California.

19
20 
21 JAMES R. HIGH, M.D.

1 **PROOF OF SERVICE**

2 **SUPERIOR COURT OF THE STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

3 **CASE NAME:** *Roya Saghafi v. Palisades Charter High School, et al.*

4 **CASE NUMBER:** BC708497

5 I am employed in the County of Los Angeles, State of California. I am over the age of 18 and
6 not a party to the within action; my business address is 725 South Figueroa Street, Suite 2500, Los Angeles, California 90017.

7 On **May 13, 2019**, I served the foregoing document described as:

8 **DECLARATION OF JAMES R. HIGH, M.D. IN SUPPORT OF DEFENDANTS PALISADES**
9 **CHARTER HIGH SCHOOL AND AMY NGUYEN'S MOTION FOR LEAVE OF COURT FOR**
10 **AN ORDER PERMITTING A MENTAL EXAMINATION OF PLAINTIFF; OR IN THE**
11 **ALTERNATIVE, MOTION TO COMPEL IME; OR IN THE ALTERNATIVE, TO EXCLUDE**
12 **EVIDENCE OF PLAINTIFF'S ALLEGED DAMAGES AT TRIAL**

13 in this action by transmitting a true copy thereof enclosed in a sealed envelope addressed as follows:

14 Ann A. Hull, Esq.
15 Hannah J. Robinson, Esq.
16 LAW OFFICES OF ANN A. HULL, INC.
17 21900 Burbank Boulevard, Third Floor
18 Woodland Hills, California 91367
19 Telephone: (818) 606-6618
20 Facsimile: (818) 322-1321

21 *Attorneys for Plaintiff*
22 *Roya Saghafi*

23 **[X] BY PERSONAL SERVICE** I caused to be delivered such document by hand to the above-
24 identified recipient through the use of **ACE Legal Attorney Services** whose address is: 811 Wilshire
25 Boulevard, Los Angeles, CA 90017, and whose telephone number is (213) 623-3979.

26 **[X] STATE** I declare under penalty of perjury under the laws of the State of California that the
27 above is true and correct.

28 Executed on **May 13, 2019** at Los Angeles, California.

29 
30 ARTHUR ESCALANTE

31 4843-2098-4214, v. 2